



WINTHROP & WEINSTINE

August 22, 2018

William A. McNab
Direct Dial: (612) 604-6652
Direct Fax: (612) 604-6852
wmcnab@winthrop.com

The Honorable Michael J. Davis
United States District Court
13E U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415

Re: *In Re: CenturyLink Sales Practices and Securities Litigation*, MDL No. 2795
This document relates to: No. 18-CV-296 (MJD/KMM)

Dear Judge Davis:

Pursuant to the Stipulation of the Parties and Local Rules 7.1(b) and 7.1(f)(1)(D), Defendants CenturyLink, Inc., Glen F. Post, III, R. Stewart Ewing Jr., David D. Cole, Karen Puckett, Dean J. Douglas, and G. Clay Bailey (collectively, the “Securities Defendants”), respectfully move the Court for a modification of the Scheduling Order and an expansion of the word count limit for the Parties’ briefing of Defendants’ upcoming Motion to Dismiss.

Under the current schedule, the Securities Defendants’ motion and supporting documents are due August 24, 2018, the Securities Plaintiffs’ opposition is due October 3, and the Securities Defendants’ reply is due November 1, 2018. With the Securities Plaintiffs’ consent, the Securities Defendants request that their initial motion papers now be due August 31, 2018, the Securities Plaintiffs’ opposition be due on October 12, 2018, and the Securities Defendants’ reply be due on November 9, 2018.

Good cause exists for this modest extension of the schedule. As noted in the Parties’ Stipulation, first, the Securities Plaintiffs’ Consolidated Complaint named additional individual defendants, who have now retained the same counsel as the previously-named defendants, and who have since agreed to waive formal service of process. Second, the Securities Defendants and their counsel have encountered unanticipated scheduling issues. Notably, because discovery is currently stayed pursuant to statute, this extension will not otherwise impact the Scheduling Order.

Also pursuant to the Stipulation, the Securities Defendants, with the Securities Plaintiffs’ consent, seek an expansion of the word count limits in Local Rule 7.1(f)(A) for the upcoming Motion to Dismiss. The Securities Defendants respectfully move for leave to file an initial brief and reply brief with a combined limit of 15,000 words, and for the Securities Plaintiffs to file an opposition brief of up to 15,000 words. Good cause exists for this expansion of the word count limit, because the Consolidated Complaint that is the subject of the motion is comprised of 140-pages, over 300 enumerated paragraphs, and a twelve-page appendix.

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For the reasons set forth herein, and with the concurrence of the Securities Plaintiffs, the Securities Defendants respectfully move that the Court enter the proposed Order filed and emailed to Chambers contemporaneously herewith, modestly adjusting the Scheduling Order and expanding the word count limit for the upcoming Motion to Dismiss. Thank you.

Very truly yours,

WINTHROP & WEINSTINE, P.A.



William A. McNab

Counsel for Defendants

cc: All counsel of record via ECF